

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA**

In re:	§	Chapter 7
	§	
Pro-Mark Services, Inc.	§	Case No. 24-30167
	§	
Debtor.	§	
_____	§	
	§	
Erik A. Ahlgren, as Chapter 7 Trustee of the	§	
Bankruptcy Estate of Pro-Mark Services, Inc., as	§	
Administrator of the Pro-Mark Services, Inc.	§	
Employee Stock Ownership Plan, and as Trustee	§	
of the Pro-Mark Services, Inc. Employee Stock	§	
Ownership Trust,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 24-07014
	§	
Connie Berg, Kyle Berg, Connie Berg Revocable	§	
Living Trust, Kyle R. Berg Revocable Living	§	
Trust, Chad DuBois, Mandy Grant, and Miguel	§	
Paredes,	§	
	§	
Defendants.	§	

**NOTICE OF APPEARANCE UNDER BANKRUPTCY RULE 9010(b)
AND REQUEST FOR ALL COPIES PURSUANT TO BANKRUPTCY RULE
2002 AND ALL PLEADINGS PURSUANT TO BANKRUPTCY RULE 3017(a)**

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Defendants Connie Berg, Kyle Berg, the Connie Berg Revocable Living Trust and the Kyle R. Berg Revocable Living Trust (collectively, the “Berg Defendants”) and pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017(a), 9007 and 9010, requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, or other documents, filed or entered in this adversary proceeding, be transmitted to:

Jordan E. Chavez
HAYNES AND BOONE, LLP
2801 N. Harwood Street, Suite 2300
Dallas, TX 75201
Telephone: 214.651.5453
Email: jordan.chavez@haynesboone.com

Please take further notice that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, messenger delivery, telephone, facsimile, telegraph, telex or otherwise filed or made with regard to the referenced case and proceedings herein.

This Notice of Appearance and Request for Notices and Papers shall not be deemed or construed to be a waiver of the rights of the Berg Defendants (i) to have final orders in noncore matters entered only after de novo review by a district judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert or exercise any other rights, claims, actions, setoffs, or recoupments to which the Berg Defendants are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

RESPECTFULLY SUBMITTED this 9th day of October, 2024.

By: /s/ Jordan E. Chavez

Jordan E. Chavez

Texas State Bar No. 24109883

HAYNES AND BOONE, LLP

2801 N. Harwood Street, Suite 2300

Dallas, TX 75201

Telephone: 214.651.5000

Email: jordan.chavez@haynesboone.com

**ATTORNEYS FOR THE BERG
DEFENDANTS**

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2024, a true and correct copy of the foregoing pleading was served via CM/ECF to all parties authorized to receive electronic notice in this case.

/s/ Jordan Chavez

Jordan Chavez